

final environmental impact statement
development concept plan

GRANT GROVE / REDWOOD MOUNTAIN
SEQUOIA-KINGS CANYON

NATIONAL PARK • CALIFORNIA





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FINAL ENVIRONMENTAL IMPACT STATEMENT
for the
DEVELOPMENT CONCEPT PLAN

GRANT GROVE/REDWOOD MOUNTAIN
SEQUOIA-KINGS CANYON NATIONAL PARKS
California

Four alternatives have been examined for future development and use at Grant Grove and Redwood Mountain, Sequoia-Kings Canyon National Parks. These alternatives focus on the overnight accommodations at Grant Grove Village and range from taking no action (health and safety measures only) to developing low-profile units or a hotel or a combination of a hotel and dispersed units. The proposed action is alternative 1, which recommends rehabilitation of some existing units and construction, at sites more removed from the meadow, of some one- and two-story structures that would incorporate amenities to meet the needs of winter visitors and tour groups. The proposed action also involves relocating the market, gas station, gift shop, shower, laundry, and other commercial facilities away from Grant Grove Meadow; consolidating and upgrading employee housing; expanding administrative and maintenance space; improving access, circulation, and visitor facilities at several critical sites; and leaving Redwood Mountain essentially undeveloped.

The review period for the DEIS ended November 7, 1986. All comments received have been reviewed and considered.

For further information, please contact

John H. Davis, Superintendent,
Sequoia-Kings Canyon National Parks
Three Rivers, California 93271
(209) 565-3341

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PREFACE

This document is an abbreviated Final Environmental Impact Statement, and the material included here must be integrated with the Draft Environmental Impact Statement for the Development Concept Plan, Grant Grove/Redwood Mountain, Sequoia - Kings Canyon National Parks to be considered complete. The abbreviated format has been used because the changes to the draft document are minor and have been determined to have no significant effect on the environment; use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 CFR 1503.4(c)). The draft and final EISs together describe the final plan, its alternatives, all significant environmental impacts, and the public comments that have been evaluated.

ERRATA

Public and agency review of the Draft Environmental Impact Statement for the Grant Grove and Redwood Mountain areas resulted in minor changes to the proposed action. These changes, technical corrections, and some additional information developed during the review process are indicated on the following pages. The public comments and the responses to them follow the errata.

P. iv, line 5 - Change to read:

rehabilitation of the comfort station and construction of a water storage tank and wastewater treatment facility at Redwood Mountain.

P. 14, line 37 - Change to read:

Modern conveniences would be incorporated into all new and rehabilitated lodging units.

P. 18, lines 24-37 (Redwood Mountain section) - Change to read:

The Redwood Mountain area provides opportunities to experience an undisturbed sequoia forest in a relatively accessible location. This area would be left in its primitive state, with only minor improvements to eliminate potential public health problems (e.g., upgrade the comfort station). The Grant Grove visitor center would continue to dispense information on the opportunities at Redwood Mountain upon request; however, no additional literature would be provided. The existing directional sign, access road, and parking area would remain as is. The comfort station would be rehabilitated, and a small water storage tank and wastewater treatment facility would be constructed.

P. 21 (Alternative 1/Proposal, Redwood Mountain map) - Change labels as follows:

Directional sign - leave as is

Access road - leave as is

Redwood Saddle - renovate comfort station; construct water storage tank and wastewater treatment facility

P. 31 (Table 1: Summary of Major Actions) - Change the Redwood Mountain summary for alternatives 1, 3, and 4 to read:

Renovate comfort station; construct water storage tank and wastewater treatment facility

P. 33 (Table 3: Summary of Estimated Costs):

Eliminate the cost of paving the Redwood Mountain road and revise the totals as follows:

Alternative 1 (\$2,972,000), Alternative 3 (\$3,187,000), and Alternative 4 (\$3,287,000)

P. 41, lines 21-23 - Change to read:

This source is reported to be inadequate to meet present needs, and a storage tank is required to ensure a reliable water supply (personal communication, Marv Jensen 1986).

P. 57, lines 12-15 - Change to read:

This is a worst-case projection based on full occupancy and maximum water consumption at new facilities; the total projected increase does not include the implementation of all passive water conservation measures, which would reduce the projected consumption by approximately 15 percent (see appendix C).

P. 57, line 35 - Add the following sentence:

Monitoring methods would include the installation of a flow gauge in Abbott Creek to determine whether there were any changes in streamflow, and the extent of such changes, as a result of water draws from Round Meadow.

P. 57, lines 41-43 - Change to read:

It provides a surface water source, and the park staff reports that the filtration and chlorination systems need to be replaced, and a storage tank needs to be constructed to meet present and future demands.

P. 58, lines 39-46 - Delete and substitute the following:

The potential threats to sequoia trees from road maintenance would remain. Road grading can damage the root systems of trees near the roadway and allow disease organisms to infect healthy trees. This potential effect would be mitigated by grading soil over the surface and not grading below the existing grade line.

P. 59, lines 1-5 - Delete and substitute the following:

There is no evidence of trampling and associated soil compaction in the area, but this could change if visitation increased. The park resource staff would periodically evaluate the effects of use and the condition of sequoia trees and would recommend mitigating measures if required.

P. 61, lines 34-36 - Change to read:

The Redwood Mountain area would remain in an essentially undeveloped condition, with only minor improvements to address public health concerns.

P. 63, lines 5-9 - Delete and substitute the following:

Grant Grove is becoming an increasingly popular destination for winter sports. On a typical winter weekday approximately 200 to 300 visitors may be found in the area participating in snowplay and other activities. On weekends these numbers increase to approximately 1,000 to 1,500 and on holidays to 2,000. Over 80 percent of these visitors are day users. Overnight users stay in concession accommodations or in private

cabins in Wilsonia. The existing winterized accommodations are filled to capacity on most winter weekends, but on weekdays they run at less than 25 percent occupancy. The concessioner estimates that the occupancy rates for weekday use would easily increase through routine advertising if there were more winterized lodging accommodations and that weekend use would certainly fill all of the 91 lodging units recommended under the proposed action.

P. 64, lines 1-5 - Delete and substitute the following:

Future visitation levels at Redwood Mountain cannot be accurately predicted; however, use of the area is so light that no adverse impacts on the natural environment are anticipated in the foreseeable future. The park would not encourage increased use of the area, but if present or future use resulted in excessive trampling near sequoia trees, protection measures would be implemented.

P. 74, table 8 - Add to the note:

The surface area totals for the overnight lodging in alternatives 3 and 4 include the new access road.

COMMENTS AND RESPONSES

The following section includes the comments of agencies, groups, and individuals on the Draft Environmental Impact Statement for Grant Grove and Redwood Mountain and the National Park Service's responses to those comments. The due date for comments was November 7, 1986, but this date was extended to December 7, 1986, to allow additional public input.

A total of 36 agencies, organizations, and individuals commented on the Draft Environmental Impact Statement. Equal numbers of respondents (11 each) supported alternative 1 (the proposed action) and alternative 2 (no action) for Grant Grove; three favored alternative 3 (a hotel); and 11 had no stated preference. None of the respondents supported alternative 4, the most extensive development proposal.

Of the individuals and organizations favoring alternative 1 for Grant Grove, most stressed the need to keep new developments rustic and compatible with their setting. Several people indicated that the existing number of lodging units should not be increased unless demand warrants and that the proposed number of units might be too high based on visitation projections. A few respondents stated that water consumption should be monitored to ensure that there are no detrimental effects on vegetation and wildlife, particularly sequoias, and a few requested that design features be incorporated to minimize the potential effects of gas leaks and petroleum runoff. Several people supported the proposals to retain low-cost lodging units, and some felt that a greater ratio of such units should be provided. One respondent stated that the proposed number of parking spaces was too large, and one recommended that all of the old units in the bowl area be removed.

The general comment of the individuals in favor of alternative 2 (no action) was that any changes to the Grant Grove setting would disturb the simple, rustic setting and that it should be left in its present condition. People who supported alternative 3 felt that consolidating facilities in a hotel would disturb less land and vegetation and would provide more amenities for overnight visitors.

Of the respondents who did not indicate a choice of alternative, one thought that additional accommodations should be provided outside the park boundary; one recommended interpretation of construction activities; one had several new alternatives but preferred replacing the Grant Grove cabins in kind; one mentioned the safety issues involving winter use and traffic circulation; and one recommended improving the water supply at Redwood Mountain and leaving the road unpaved.

The largest single concern expressed by the respondents was that the Redwood Mountain area be left as is, with no road paving and no additional signs or advertisement. Four organizations and 20 individuals supported this position. The Park Service has since modified the proposal for Redwood Mountain to reflect this view (see the "Errata" section).

Based on consideration of all of these comments and subsequent management discussion and analysis, the Park Service has decided to retain alternative 1 as the proposed action, with the deletion of road improvements from the Redwood Mountain proposal and the other minor changes described in the "Errata" section.

SUMMARY OF PUBLIC SUPPORT FOR ALTERNATIVES

	Alternative 1 (Proposed Action)	Alternative 1 - Grant Grove / Alternative 2 - Redwood Mountain	Alternative 2 (No Action)	Alternative 3 (Hotel)	Alternative 4 (Hotel and Detached Units)	No Stated Preference
Federal and State Agencies	--	--	--	--	--	5
Organizations	--	3	--	--	--	2 ^a
Individuals	<u>2</u>	<u>6</u>	<u>11^b</u>	<u>3^c</u>	<u>--</u>	<u>4^d</u>
Total	2	9	11	3		11

-
- a. One organization supported alternative 2 for Redwood Mountain.
 - b. Two individuals asked that only alternatives 1 and 2 be considered, but they preferred alternative 2.
 - c. One individual supported alternative 2 for Redwood Mountain.
 - d. Two individuals supported alternative 2 for Redwood Mountain.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

NOV 13 1986

10 NOV 1986

John H. Davis, Superintendent
Sequoia-Kings Canyon National Parks
Three Rivers, California 93271

Dear Mr. Davis:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled GRANT GROVE/REDWOOD MOUNTAIN, SEQUOIA-KINGS CANYON NATIONAL PARK, CALIFORNIA. We have the enclosed comments on this DEIS.

We have classified this DEIS as category LO, Lack of Objections (see attached "Summary of Rating Definitions and Follow-Up Actions"). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send 2 copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact David Powers, Federal Activities Branch, at (415) 974-8193 or FTS 454-8193.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

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Enclosure (2 pages)

EPA Comments:

1. While all the alternatives state that there will be no impact to wetlands, widening of the roadway may necessitate the placement of fill material in the meadow which would require a Clean Water Act Section 404 discharge permit (DEIS p. 58). A Section 404 permit is required for activities in areas designated as wetlands which result in the discharge of dredged or fill materials. Wetlands are special aquatic sites and are afforded special protection under Federal regulations (40 CFR 230.10(a)(3)). If a permit is required, additional information on the quantity of fill to be used, the potential disposal sites, and the type of fill to be discharged will be needed.
2. Construction activities may result in impacts to water and air quality. The FEIS should describe measures to be used to reduce construction-induced erosion and the resultant increase in sedimentation. Also, measures which will be used during construction activities to minimize the production of dust and particulate matter should be discussed.
3. Page 63 of the DEIS projects a 75 percent increase in overnight lodging stays under the preferred alternative. This has the potential to increase the wastewater treatment capacity needed to accommodate increased visitor use of water. The FEIS should discuss the treatment (method and capacity) which will be used to ensure that water quality is not degraded.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640 Policy and Procedures for the Review of
Federal Actions Impacting the Environment

Response to comments by the Environmental Protection Agency

1. When the Generals Highway is widened adjacent to the meadow, a section 404 discharge permit may be required. We will avoid disturbing the meadow area if possible, but if a reasonable alternative to placing fill in the meadow cannot be found, we will include the project specifications with the permit request.
2. At the design stage, mitigating measures to reduce or prevent erosion and sedimentation and minimize the production of dust and particulate matter will be incorporated into the contract specifications.
3. The wastewater treatment capacity and potential effects on water quality are fully discussed in the 1985 Environmental Assessment for a Sewage Treatment Plant and Expanded Water Storage Facilities, as indicated on p. 8 of the DEIS.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
SACRAMENTO ENDANGERED SPECIES OFFICE
2800 Cottage Way, Room E-1823
Sacramento, California 95825-1846

NOV 26 1986

✓ JPC/12
✓ M. L. 12/12

MEMORANDUM

TO : Regional Director, Western Region, National Park Service, 450 Golden Gate Avenue, San Francisco, CA 94102

FROM : Field Supervisor, Endangered Species, Sacramento, CA (SES0) ^{hnd}

SUBJECT: Section 7 Endangered Species Act Consultation on Draft Environmental Impact Statement for the Development Concept Plan, Grant Grove/Redwood Mountain, Sequoia-Kings Canyon National Parks, California (Case No. 1-1-87-I-86)

Your October 29, 1986 memorandum to our Portland Regional Director requesting Section 7 formal consultation pursuant to the Endangered Species Act was referred to this office for response. We have reviewed the subject document and determined that there will be no effect to any Federally listed, proposed, or candidate species. Thus, pursuant to our Section 7 Interagency Regulations (50 CFR Part 402.14), formal consultation pursuant to the Endangered Species Act is not required on this project.

Please be aware that other offices of the Fish and Wildlife Service may comment on the overall environmental acceptability of the proposed project.

Thank you for your interest in endangered species.

David L. Harkow

cc: Chief, Endangered Species, Portland, OR (FWE-SE; Attn: Ralph Swanson)
Field Supervisor, Ecological Services, Sacramento, CA (ES-S)

Response to the U.S. Fish and Wildlife Service

1. We propose to resurvey the Grant Grove area in the near future for the presence of the endangered and threatened California pityopus (Pityopus californicus). If any plants are located, they will be protected and avoided.

Resources Building
1416 Ninth Street
95814

(916) 445-5656
TDD (916) 324-0804

OCT 31 1986

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

California Conservation Corps
Department of Boating and Waterways
Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Parks and Recreation
Department of Water Resources

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✓	PERS	

Air Resources Board
California Coastal Commission
California Tahoe Conservancy
California Waste Management Board
Colorado River Board
Energy Resources Conservation and Development Commission
San Francisco Bay Conservation and Development Commission
State Coastal Conservancy
State Lands Division
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Boards

Mr. John Davis, Superintendent
Sequoia-Kings Canyon National Parks
Three River, CA 93271

October 29, 1986

Dear Mr. Davis:

The State has reviewed the Draft Environmental Impact Statement, Grant Grove/Redwood Mountain, Sequoia-Kings Canyon National Parks, submitted through the Office of Planning and Research.

Review of this document was coordinated with the Regional Water Board and the Departments of Conservation, Fish and Game, Parks and Recreation, Water Resources, Health Services, and Transportation.

None of the above-listed reviewers has provided a comment regarding this proposed project. Consequently, the State will not have a comment to offer.

Thank you for providing an opportunity to review this document.

Sincerely,

Charles K. Fellows

for Gordon F. Snow, Ph.D
Assistant Secretary for Resources

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

(SCH 86081813)

OFFICE OF HISTORIC PRESERVATION

DEPARTMENT OF PARKS AND RECREATION

POST OFFICE BOX 942896

SACRAMENTO, CALIFORNIA 94296-0001

(916) 445-8006

REPLY TO: NPS861010A

NOV 28 '86

November 18, 1986

Mr. Howard Chapman
Regional Director, Western Region
National Park Service
450 Golden Gate Avenue, Box 36063
San Francisco, California 94102

Re: Draft Environmental Impact Statement/Development Concept Plan
for Grant Grove/Redwood Mountain, Sequoia-Kings Canyon National Parks,
California.

Dear Mr. Chapman,

The Office of Historic Preservation (OHP) has reviewed and would like to comment on the Draft Environmental Impact Statement/Development Concept Plan for Grant Grove/Redwood Mountain, Sequoia-Kings Canyon National Parks, California (DEIR).

The effect of the proposed plans cannot be evaluated until we have information on the boundaries of the General Grant National Register historic district, as it relates to the various proposed project alternatives. Once we have received this information, we will be able to comment on the adequacy of the DEIR and the effect of the proposed project alternatives on historic properties.

Thank you for the opportunity to comment on the above-referenced document. We await the requested information and anticipate that we can respond in an expeditious fashion. If you have any questions please contact Mr. Robert Jackson of our staff, at (916) 322-9602.

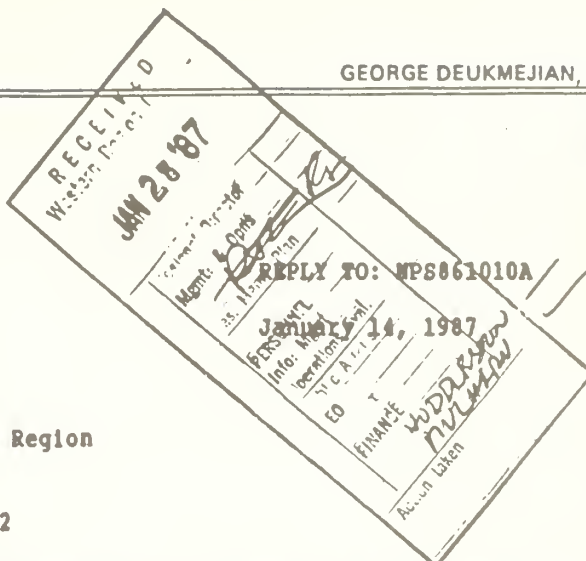
Sincerely,



Kathryn Gualtieri

State Historic Preservation Officer

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
POST OFFICE BOX 942896
SACRAMENTO, CALIFORNIA 94296-0001
(916) 445-8006



Mr. Howard Chapman
Regional Director
National Park Service - Western Region
450 Golden Gate Avenue
Box 36063
San Francisco, California 94102

Re: Draft Environmental Impact Statement/Development Concept Plan for
Grant Grove/Redwood Mountain, Sequoia-Kings Canyon National Parks,
California.

Dear Mr. Chapman,

The report cited above was received in this office on October 10, 1986. In a November 18, 1986 response to that report, the Office of Historic Preservation (OHP) requested additional information concerning the location and size of the General Grant National Register District, in relation to the proposed project alternatives. We recently received the requested information from the Denver Service Center and we are now able to concur that none of the proposed project alternatives would affect any historic properties contributing to the General Grant Historic District. Therefore, we concur in your determination that the proposed undertaking will not affect National Register eligible properties.

The consideration granted historic properties to date fulfills your requirements under Section 106 of the National Historic Preservation Act, as codified in 36 CFR 800. However, the provisions of 36 CFR 800.11 should be applied if previously unidentified and potentially eligible National Register properties are encountered during construction.

The Office of Historic Preservation (OHP) has reviewed and would like to comment on

Thank you for your continued concern for, and protection of, important cultural resources. If you have any questions please contact Mr. Robert Jackson of our staff, at (916) 322-9602.

Sincerely,

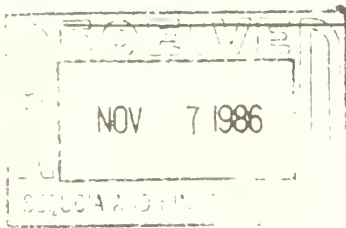
Kathryn Guattieri
State Historic Preservation Officer



UNITED STATES
DEPARTMENT OF
AGRICULTURE

FOREST
SERVICE

900 West Grand Avenue
Porterville, CA 93257-2035



✓	Sequoia	(11)
	AS	National
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	MA	
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REPLY TO: 1950

DATE: November 5, 1986

Mr. John H. Davis, Superintendent
Sequoia and Kings Canyon National Parks
Three Rivers, CA 93271

Dear Mr. Davis:

We have reviewed the Draft Environmental Impact Statement for Grant Grove/Redwood Mountain. While the various on-site considerations appear to have been well-taken care of, we are concerned that certain spill-over effects on National Forest lands have not been analyzed. We are specifically concerned about the following:

1. Page 18: Improvements to the Panoramic View Point will draw more visitors. This view point shows mainly National Forest lands in the foreground and middle ground. Provision should be made for joint signing to explain the differences in management between the National Park Service and Forest Service.
2. Page 18: The intersection at Quail Flat/Generals Highway isn't a good one now. Adding another higher standard road to this will compound present problems. Sight distance and lack of advanced signing need to be addressed.
3. Page 62: We judge that a 75% increase in overnight lodging will increase traffic on the Generals Highway and thus National Park Service visitor use of adjacent National Forest lands. It is our observation that the Park day users stay mostly in the National Park to visit specific things they came to see. The overnight user tends to drive to the surrounding areas such as Hume Lake, Cedar Grove, and Giant Forest as well. This additional impact on National Forest land should be analyzed.
4. Page 63: Volume of winter use is currently high in the Grant Grove area. Visitors are encouraged to disperse onto National Forest lands. Roads to Quail Flat, Big Meadows, and Woodward Creek are plowed to accommodate this use. With increased winter visitation these areas will experience greater use and, due to volumes, potentially higher levels of user conflict and congestion. However, no mention of this potential is made with respect to either the Park or the Forest.

In addition, we have several questions regarding the road access and paving portion of the Redwood Mountain element of your proposal:

- a. Did you consider the impact of the annual cattle drive authorized to a National Forest permittee?





Mr. John H. Davis, Superintendent

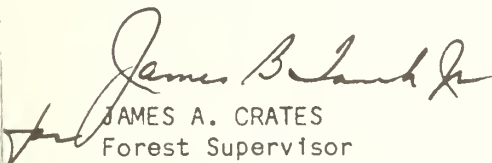
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- b. Will vehicular access be maintained through to the County Road at Eshom?
- c. Will the paved portion of the road to Redwood Saddle be open to winter use?
If it were, snowplayer and nordic skier use could be dispersed between Park and Forest areas.

Finally, we see an opportunity to provide needed information to the travelling public at your entrance station. Signs both before and at the station could explain that visitors bound for the National Forest do not have to pay entry fees to the National Park. Directional signing for National Forest destinations could also be included.

Thank you for the opportunity to review the Grant Grove/Redwood Mountain Draft Environmental Impact Statement. If you or your staff have any questions about our comments, please do not hesitate to call.

Sincerely,


JAMES A. CRATES
Forest Supervisor



Response to Comments by the U.S. Forest Service

1. The Panoramic Point road improvements will undoubtedly increase use to some degree. We are most willing to work toward a joint signing program for that road that will highlight Forest Service and Park service management programs. Details of design, wording, and cost can, with appropriate review, be worked out by the field units of the two areas.
2. As indicated in the "Errata" section, the proposed action has been modified to retain the present road standard for Redwood Mountain. Therefore, the situation with respect to the Quail Flat intersection will not change under this action. However, the Park Service is most willing to work with the Forest Service to the extent possible in correcting any deficiencies in signing and sight distances.
3. The 75 percent increase in overnight accommodations translates to an increase of 39 rooms or just less than 160 people per night (approximately 4 people/room). This is not a significant increase, and it is expected that the vast majority of visitors to the Grant Grove area will continue to be day users. We do not anticipate any significant increase in use of the nearby Forest Service lands or facilities.
4. As indicated in the "Errata" section, the volume of winter use in the Grant Grove area is about 200 to 300 people/day on typical weekdays and 1,000 to 1,500 people/day on weekends. The winterized accommodations will be increased from about 24 to about 90 lodging units (96 to 360 people). Some of the overnight guests will use the nearby Forest Service lands. However, most use will continue to be day use and will not be significantly altered by the proposed expansion of lodging units.
5. Redwood Mountain - As stated above, the proposal has been modified to leave the Redwood Mountain road unpaved. With an unpaved road as now proposed, the answers to the questions raised are as follows.
 - a. The annual cattle drive will be allowed to continue.
 - b. Vehicular access will be maintained as at present.
 - c. The road to Redwood Saddle will not be open to winter use.

We will be most happy to work with the Forest Service in providing information to the traveling public at the entrance and visitor stations within our capacity to do so. Considerable written information is now being provided and there are a number of signs. We feel that visitors have difficulty absorbing all of the existing information and therefore have concerns about adding more. However, we are willing to consider any proposals the Forest Service may wish to make.



NOV 28 1986

SIERRA CLUB

LEGAL DEFENSE FUND, INC.

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Sanrise, Mr. McKinley

Ann L Adams

2044 Fillmore Street

San Francisco, California 94115

415 567-6100

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Staff Writer

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(907) 586-2751

November 26, 1986

John H. Davis, Superintendent
Sequoia-Kings Canyon National Parks
Three Rivers, CA 93271

Re: Comments on Grant Grove/Redwood
Mountain Draft EIS

Dear Mr. *Tack* Davis,

The Sierra Club's comments on the Draft EIS for the Development Concept Plan for Grant Grove/Redwood Mountain are set forth in the November 6, 1986 letter to you from Gordon L. Nipp, copy attached. I have nothing to add to those comments, except to express my personal gratification at the Park Service's very reasonable approach in this matter and my thanks for allowing me additional time to comment.

I hope to get down to Sequoia-Kings Canyon some day soon and would enjoy saying "hello."

Sincerely,

Mike Sherwood

Michael R. Sherwood

MRS:leg



NOV 1 1986

SIERRA CLUB

Southern California Regional Conservation Committee

P.O. Box 3357
Bakersfield, CA 93385
November 6, 1986

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John H. Davis, Superintendent
Sequoia-Kings Canyon National Parks
Three Rivers, CA 93271

Dear Mr. Davis:

We have the following comments on the Draft EIS for the Development Concept Plan for Grant Grove/Redwood Mountain.

We generally support the thrust of Alternative 1, the proposed action, to maintain the existing rustic character of the Grant Grove area, to restore Grant Grove Meadow, and to reduce congestion at the Big Stump entrance station. We have some reservations about the need to build new motel units and large parking lots in the Grant Grove area, especially since there have not been significant increases in visitor use in the past few years. This concern is heightened by the fact that existing lodging capacity is not nearly fully utilized during much of the year and by the prospect that the new construction would necessitate the removal of about 124 large trees. We feel that the Final EIS should contain a more thorough justification of this aspect of the development proposal.

1

We have several concerns about the proposed Redwood Mountain area development. Given the current budget cutbacks and given the increased visitor use that the proposal would encourage, we wonder if a concomitant increase in Park Ranger patrols in this outlying area is feasible. Also, it is our information that this area was one of the earliest controlled burn areas in the Park. How will increased visitor use affect study and monitoring of this burn?

2

We are pleased that low-cost lodging units are to be maintained in Grant Grove Village, and we support most of the proposals for Grant Grove Village development. Thank you for the opportunity to comment.

Sincerely yours,

Gordon L. Nipp

Gordon L. Nipp
National Parks Committee

Response to Gordon L. Nipp, Sierra Club

1. There is sufficient evidence, based on the numbers of people that request lodging and cannot be accommodated during the summer season, to indicate that there is demand for an additional 39 lodging units. These additional units represent a significant percentage increase but are relatively small in total numbers. The increase appears to be reasonable considering the space available for additional development and the present and anticipated future demand for overnight accommodations. Parking for lodging accommodations is inadequate at the present time and with the additional units will need to be expanded. At the same time the development is being moved back from the edge of the meadow to reduce impacts. Visitor use has increased from 1.6 million in 1980 to just over 2 million in 1986, indicating a definite trend of increased demand for visitor accommodations. The proposed increase takes into consideration available space and effects on park resources.

Lodging is not filled to capacity on a year-round basis because visitation to the park is highly seasonal (70 percent in the months of May through September). Winter months experience very low use; this may be affected by the fact that there are only 24 winterized units available.

Considerable care is being taken to minimize the number of trees to be removed while accommodating the modest increase in the number of lodging units and relocating facilities away from the meadow to the extent possible.

2. Concerning the Redwood Mountain, we have reconsidered the draft proposal and modified it. The proposed action now is to leave the access road unpaved and to make no changes to the signing or distribution of information.

NOV 11 1986

MINERAL KING GROUP of the SIERRA CLUB

P.O. Box 3992, Visalia, California 93278

November 5, 1986

John H. Davis, Superintendent
Sequoia-Kings Canyon National Parks
Three Rivers, California 93271

Re: Grant Grove/Redwood Mountain DEIS

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Dear Mr. Davis:

As you know, the Mineral King Group of the Sierra Club maintains an ongoing interest in events and policies proposed by the National Park and would like to thank you and your staff for this opportunity to respond to the DEIS issued for the development concept plan in the Grant Grove/Redwood Mountain area. The document was well prepared and well illustrated and all those involved with its preparation are to be commended.

Let me begin by saying that while the figures found in the tables on pages 52 and 53 do not seem to offer any numerical justification in either visitation or lodging requirements for the proposed increase in lodging facilities, we do agree that the situation at Grant Grove is a product of random growth over many years and that the existing structures and their siting are far from ideal. It is also our belief that a program of sensitive refurbishment and resiting if existing uses would be to the benefit of all park visitors.

The program outlined in Alternative One (Expanded Facilities in a Dispersed Arrangement) involving removal, replacement, and renovation seems well thought out and complementary to other developments currently planned in the park. Our primary concerns are (1) maintenance of a low impact, low profile, even "rustic" nature in the design of the facility and site, and (2) that any new or relocated facilities be confined to areas of existing development and not be allowed to expand or intrude into the essential park experience more than absolutely necessary.

In the matter of the development of the Redwood Mountain area, our view differs greatly from those expressed in the DEIS. The report states that Redwood Mountain is "a significant resource that remains unknown to most visitors" and that there is "...little information available on this large grove of sequoias in a wilderness setting..." We ask what seems to be the problem here? Must each grove of sequoias be opened to tour busses, parking lots, comfort stations, and the like simply because they exist? We realize that the park now conducts guided nature hikes in

this area and that even this use puts a strain on the non-functioning facilities at Redwood Saddle.

However, it is our feeling that the Redwood Canyon area has maintained its unique qualities and solitude precisely because of the nature of the access roads and that the park has not yet created a visitor "destination" out of this magnificent area. It is certain that those familiar with the park know of other areas where this also holds true. When the canyon was designated "wilderness" some time ago, it was our hope (and one we hoped was shared by the park) that the trail of candy bar wrappers would stop back at the Generals Highway. Paving and signing the road to Redwood Canyon would have, we believe, an overall long-term detrimental effect on the area.

Those visitors who now wish to are certainly able to visit the grove and enjoy the serenity to be found there. Yes, the restroom and seasonal residence could stand renovation, but transformation of the Redwood Mountain area into a park "attraction" just does not seem fitting when there are so many others to which this has already been done.

Thus, after review of the given alternatives, we would like to state our support, at least in part, for Alternative One, excluding the any further development of the Redwood Mountain area.

Respectfully,

A handwritten signature in dark ink, appearing to read "John F. Slaven". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John F. Slaven
Conservation Chairman

Response to John F. Slaven, Sierra Club

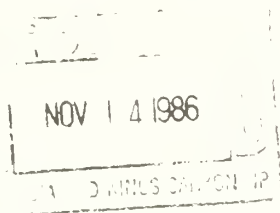
1. Please see the previous response to G.L. Nipp, Sierra Club.



National Parks & Conservation Association

1701 Eighteenth Street, N.W. • Washington, D.C. 20009

RUSSELL D. BUTCHER
Regional Representative
SOUTHWEST & CALIFORNIA
Box 67
Cottonwood, AZ 86326
(602) 634-5758



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202) 265-2717

November 10, 1986

Mr. John H. Davis
Superintendent
Sequoia-Kings Canyon National Parks
Three Rivers, California 93271

RE: DRAFT EIS FOR THE DEVELOPMENT
CONCEPT PLAN, GRANT GROVE/
REDWOOD MOUNTAIN, KINGS CANYON
NATIONAL PARK

Dear Jack:

National Parks and Conservation Association, a private nonprofit membership organization founded in 1919 to promote the protection, enhancement, and public understanding of the National Park System, greatly appreciates this opportunity to comment on the Grant Grove and Redwood Mountain Development Concept Plan Draft Environmental Impact Statement.

Regarding the Grant Grove development concept plan, we enthusiastically support and urge your Preferred Alternative (Alt. 1) proposal to enhance the current development situation around the southerly end of Grant Grove Meadow. By removing the restaurant and gas station structures, you will not only be able to restore that stretch of the meadow edge to a natural condition, but visitors will then focus exclusively upon educational/informational aspects of the park's Visitor Center. The view of the meadow from the Visitor Center will also be unrestricted, as it should be. And the present congestion caused by combining Visitor Center and commercial activities in the same area will be substantially reduced in the Visitor Center vicinity.

We favor relocating the gas station to a site well north of the environmentally sensitive meadow in a commercial center also to include a market, deli, gift shop, post office, etc. We note on page 93 of the document, however, that some concern is expressed over the possibility that a gasoline leak from the gas station could flow down Mill Flat Creek to the meadow. Acknowledging that this is an unlikely event and one that has to date not occurred at the present location of the gas station, we urge nevertheless that ways be explored for containing such a leak; and if measures can be found to safeguard the meadow ecosystem from any such risk, they should be included in the Final EIS.

1

Concerning the proposed new site of the restaurant building under Alternative 1, this appears to be a substantial improvement over the present location. We cannot help but notice a number of references in the document, though, regarding the prediction of traffic congestion in the vicinity of the main park highway and the road that will provide access to the restaurant, campground, and overnight lodgings. We agree that there may become a regrettable traffic problem--particularly resulting from the presence of the restaurant parking turnoff being situated so close to the junction of park's main road and the access road. There would seem to be a high risk of difficulty should vehicles turning off of the main road get backed up behind left-turning vehicles delayed from making a turn into restaurant parking by outbound vehicles from the campground/overnight lodgings areas. We would simply ask: should the restaurant building be slightly re-positioned so that parking would be located around the easterly side of the building? Or should the building be situated in an entirely different area? For example, it might be possible to place the restaurant just west of the two proposed motel-type units or perhaps in the general vicinity of Alternative 3's hotel/restaurant building. The latter two options would greatly reduce the complex traffic-flow problem near the junction with the main highway. It would also leave undeveloped and in a natural condition the attractive knoll at the northern end of the meadow.

2

Concerning overnight lodgings, we believe Alternative 1 proposes to strike a reasonable balance. We're especially supportive of plans to reduce the array of structures in The Bowl--the closest lodgings to the Visitor Center. Likewise we view as a plus the plan to remove all existing NPS storage structures and several employee residences from The Boneyard area, and re-develop this site with cluster-type accommodations.

Rehabilitation of existing Meadow Camp cabins also seems appropriate, particularly in light of the fact that these rustic structures have historic value. Positioning of the two proposed motel-type units away from the meadow vicinity is sound planning.

It is a commendable provision of the Draft EIS that all new structures are to be deliberately and carefully designed to convey an appropriate rustic ambience, blending with the park environment and harmonizing with existing older structures. This objective has been quite successfully implemented at certain other national parks, notably at Bryce Canyon and Zion. We also favor the important goal of providing accommodations of different price ranges.

Proposed new and relocated NPS facilities (housing for staff, etc.) all appear well thought out under Alternative 1.

Finally, the plan to pave the access road into Redwood Saddle at Redwood Mountain raises several questions: while at present

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this route is hardly what we would consider an ideal driving experience, in part because of the often extremely dusty conditions that unattractively coat vegetation and because of sharp blind curves, NPCA questions whether paving is the appropriate solution. By paving the present road width, the ease of driving in and out will of course be enhanced and there will be no more dust coating adjacent vegetation. However, the several sharp curves will remain and these may become a greater risk for accidents for two reasons: more visitors will predictably be tempted to drive to Redwood Saddle; and, given the improved road surface, they may drive the road faster. We suggest an alternative: rather than paving, the present dirt road could be treated periodically with a substance that substantially reduces the dust problem. To enhance the driving experience further, it may be helpful to provide a couple of turnouts to allow vehicles passing room. And some discreet, appropriate signing may also provide a warning of caution upon approaching the sharp curves. (It is always rather amazing how some drivers seem to believe there'll never be an oncoming vehicle around a sharp turn of a single-lane road!)

We hope the above thoughts and suggestions may prove helpful. Again, Jack, we are grateful for the chance to comment.

With best regards,



Russell D. Butcher
Southwest-&-California Representative
Box 67, Cottonwood, AZ 86326

cc: T. Destry Jarvis,
NPCA's Vice President
for Conservation Policy

3

Response to Russell D. Butcher, National Parks and Conservation Association

1. There are new storage tank standards in the state of California that include very strict requirements such as double walled tanks, test monitoring probes, etc. Compliance with these requirements should essentially eliminate any risk of leakage.
2. There is a serious traffic problem during high use periods at the existing turnoff to the visitor center/restaurant/market/lodging complex. The proposal will relocate the turnoff, which could result in a problem at the north end of the meadow; however, the turning lanes to be added on the highway are expected to substantially mitigate that problem. The specific design and location of the parking lot will be determined in the comprehensive design plan, which will precede construction.
3. The proposal has been modified to leave Redwood Mountain essentially as is, with the exception of necessary restroom facilities and associated water and wastewater treatment improvements.

OCT 27 1986

P.O. Box 1923
Davis, CA 95617

October 21, 1986

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Mr. John H. Davis, Superintendent
Sequoia - Kings Canyon National Parks
Three Rivers, CA 93271

Dear Mr. Davis:

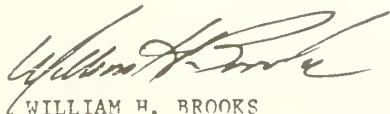
In response to your Draft Environmental Impact Statement of the Grant Grove/Redwood Mountain area in Sequoia - Kings Canyon N.P., I offer the following comments.

The "Draft Recommendations for a California Soil Conservation Plan" (March 1986) recognizes that the major soil conservation problems associated with National Park Service land in the Sierra Nevada is roadside, trail erosion, and site development. One of the major objectives outlined in the plan is the reduction of soil erosion due to construction activities. It is recommended by the Soil Conservation Advisory Committee that soil erosion control efforts be prioritized and that education and demonstration programs be established to illustrate practices which mitigate soil erosion problems.

Alternative I (proposed action) describes a relatively limited total area (10 acres) in which disturbance will occur as a result of the proposed development of the Grant Grove and Redwood Mountain facilities. A good opportunity exists to demonstrate sound mitigation measures employing appropriate native vegetation and rock materials where possible to thwart the exacerbated high runoff and high erosion potential represented in areas where the Granite Rockland soils are disturbed during the construction phase. Such demonstrations could be properly signed thereby serving the public in terms of interpretation as well as recognizing California's effort to reduce soil erosion through the implementation of a unified and multiagency approach. Except where necessary, surface paving and the application of soil binders do not seem compatible with the general issues and concerns driving the proposed development.

I hope these suggestions are useful to your efforts. I appreciate the opportunity to review the draft FIS.

Sincerely,



WILLIAM H. BROOKS
Consultant, Resources Management

Response to W.H. Brooks, Soil Conservation Advisory Committee

1. Interpretive signs that describe the overall rehabilitation process are a valuable public education tool and will be considered during the construction phase.

✓	10/2/73
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J. Neil Fernbaugh
1619 W. Monte Vista
Visalia, Calif. 93277

Mr. Jack Davis, Superintendent
Sequoia-Kings Canyon National Park
Three Rivers, California

Dear Superintendent Davis,

ERS		
FRES		

I appreciate your apparant choice of alternatives for the Grant Grove - Redwood Canyon Environmental Impact review. I think it is importnat to keep the Grant Grove development rustic and dispersed. I have to concerns I wish to share with you, however, and I hope you will keep them in mind as you proceed in the development process.

First, I am not convinced that even a doubling of overnight accomodations at Grant Grove can be justified on a year around basis. To be sure there is overcrowding on those few holiday week-ends, but that is not adequate reason to enlarge the facilities. If significant additional facilities are needed, why not consider building them at locations the NPS has purchased in Wilsonia, or encouraging private or Forest Service facilities at Stony Creek, Squaw Valley, or at Barton's Flat? I believe that it is in keeping with the present administrations policies to encourage private development. If the demand for overnight housing of bus tours is there, wouldn't places like Snow Line Lodge expand to capitalize on it?

1

Second, I am concerned that the plan calls for paving the road, and increasing the use of Redwood Canyon. There are adequate day use trails at Giant Forest, Grant Grove, Atwell Mill, and Lost Grove. You have not been able to maintain even the trail from Lost Grove to Dorst Camp. For the casual visitor who wants to drive on a paved road to a grove, the facilities already exist. Redwood Canyon provides a more isolated experience and should remain that way. As the site of some of the original controlled burns, it should be kept as a study area. It is hard now for you to finance adequate ranger patrols in the present developed areas. By allowing more use of Redwood Cyn. you are creating a patrol problem. By paving the road you are creating an entrance station problem since it will be more likely used by hunters and ORVs, as well as fee avoiders. I feel that you can save time, money and effort by downplaing any improvement of access to the Redwood Canyon area.

2

Thank you for your consideration

J. Neil Fernbaugh
J. Neil Fernbaugh
Visalia

P.S. Please keep me informed of future plans
X
Thanks, Again

Response to J. Neil Fernbaugh

1. The possibility of relocating new facilities outside the park was evaluated but rejected for several reasons (see p. 28 of the DEIS). Current visitor use and the number of people requesting rooms that cannot be accommodated during the peak summer months is sufficient indication that the demand exists for the 39 additional units. Locating the new units in the parks will provide a better opportunity for visitors who do not camp to enjoy the evening and early morning hours.
2. Please see the response to Gordon L. Nipp, Sierra Club.

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Bonnie Campbell, Team Captain, Interpretive Planner - Responsible for description of the socioeconomic environment and the socioeconomic impacts

Jacob Hoogland, Cultural Resource Specialist - Responsible for cultural resource sections

John Ochsner, Landscape Architect - Responsible for generation of design alternatives

Robert Schiller, Environmental Specialist - Responsible for environmental compliance coordination

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Sequoia-Kings Canyon National Parks

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Jon Haman, Geologist

As the nation's principal conservation agency, the Department of the Interior has basic responsibilities to protect and conserve our land and water, energy and minerals, fish and wildlife, parks and recreation areas, and to ensure the wise use of all these resources. The department also has major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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